

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

Melissa Baily (Bar No. 237649)

3 melissabaily@quinnemanuel.com

Lindsay Cooper (Bar No. 287125)

4 lindsaycooper@quinnemanuel.com

50 California Street, 22nd Floor

5 San Francisco, California 94111-4788

Telephone: (415) 875-6600

6 Facsimile: (415) 875-6700

7 *Attorneys for Google LLC*

8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

10 SAN FRANCISCO DIVISION

11 GOOGLE LLC,

12 Plaintiff,

13 vs.

14 SONOS, INC.,

15 Defendant.

CASE NO. 3:20-cv-06754-WHA

Related to CASE NO. 3:21-cv-07559-WHA

**DECLARATION OF JOCELYN MA IN
SUPPORT OF GOOGLE LLC'S
ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF THE PARTIES' JOINT
DISCOVERY LETTER**

1 I, Jocelyn Ma, declare and state as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at Quinn Emanuel Urquhart & Sullivan LLP representing
4 Google LLC (“Google”) in this matter. I have personal knowledge of the matters set forth in this
5 Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Google’s Administrative Motion to File Under
7 Seal Portions of the parties’ Joint Discovery Letter regarding Topic No. 6 of Google’s Federal Rule of
8 Civil Procedure 30(b)(6) Notice of Deposition to Sonos, Inc. (“Sonos”) (“Joint Discovery Letter”). If
9 called as a witness, I could and would testify competently to the information contained herein.

10 3. Google seeks an order sealing the materials as listed below:

Document	Portions to be Filed Under Seal	Designating Party
Joint Discovery Letter	Portions highlighted in green	Google and Sonos
Joint Discovery Letter Exhibit 1 (“Exhibit 1”)	Portions highlighted in green	Google and Sonos

16 //

17 //

18 //

19 //

20 4. The portions of the parties’ Joint Discovery Letter and Exhibit 1 highlighted in green
21 contain confidential business information, including terms to a confidential agreement and details
22 regarding Google’s business partnerships that are not public. Public disclosure of this information
23 would harm Google’s competitive standing and its ability to negotiate future agreements by giving
24 competitors access to Google’s highly confidential business thinking and asymmetrical information
25 about Google’s collaboration strategies and partnerships with other entities. If such information were
26 made public, I understand that Google’s competitive standing would be significantly harmed. I also
27 understand that a less restrictive alternative than sealing the green-highlighted portions of the parties’
28 Joint Discovery Letter would not be sufficient because the information sought to be sealed is Google’s

1 proprietary and confidential business information but is necessary to the parties' Joint Discovery
2 Letter.

3 I declare under penalty of perjury under the laws of the United States of America that to the
4 best of my knowledge the foregoing is true and correct. Executed on August 19, 2022, in San
5 Francisco, California.

6 DATED: August 19, 2022

7 By: /s/ Jocelyn Ma
8 Jocelyn Ma

ATTESTATION

I, Charles K. Verhoeven, am the ECF user whose ID and password are being used to file the above Declaration. In compliance with Civil L.R. 5-1, I hereby attest that Jocelyn Ma has concurred in the aforementioned filing.

DATED: August 19, 2022

/s/ Charles K. Verhoeven

Charles K. Verhoeven